

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

<p>In Re:</p> <p><b>BDC GROUP, INC.,</b></p> <p>Debtor-In-Possession.</p>	<p>Case No. 23-00484</p> <p>Chapter 11</p> <p><b>JOINDER TO MOTION TO SET DEADLINE FOR DEBTOR TO FILE AMENDED PLAN AND DISCLOSURE STATEMENT</b></p>
---	---

COMES NOW Manchester Leasing Services, Inc. (“MLS”), through its attorney, and in support of its Joinder to the Motion To Set Deadline For Debtor To File Amended Plan and Disclosure Statement as filed herein by GreenState Credit Union (Docket #360) states as follows:

1. MLS provided the Debtor with financing to purchase certain equipment and also is the lessor on certain leases of equipment with the Debtor.
2. During the pendency of this proceeding the Debtor rejected four (4) of the MLS lease accounts and assumed six (6) other lease accounts. In addition to the lease accounts, there are nine (9) retail finance accounts concerning equipment in the Debtor’s possession subject to MLS’s purchase money security interests which the Debtor has indicated it intends on retaining.
3. The Debtor is currently only making adequate protection payments to MLS with respect to one (1) of the retail finance accounts. The Debtor is in possession and using the equipment that is the subject of the other eight (8) retail finance accounts without making any monthly payments or adequate protection payments to MLS.

4. Previously MLS filed an extensive Objection (Docket #260) to the Debtor's Motion (Docket #249) seeking to reduce the time period that creditors would have to object to the adequacy of the Disclosure Statement and/or the confirmation of the proposed Plan previously filed herein by the Debtor. In its Objection, MLS indicated it would be filing an Objection to confirmation of the Debtor's proposed Plan due to the proposal of the Debtor to extend the repayment period on MLS's secured claims to ten (10) years, among other things.

5. At the hearing held on October 27, 2023, the Debtor withdrew its Motion to Shorten Time and advised the Court and creditors participating that the Debtor would be filing an Amended Plan and would not be proceeding to confirmation on the initial Plan filed by the Debtor.

6. Since the October 27, 2023 hearing the Debtor has not formally withdrawn its initial Plan nor has the Debtor filed an Amended Plan so as to permit this proceeding to move forward to confirmation of an acceptable plan or other disposition.

7. MLS joins in the Motion filed by GreenState Credit Union (Docket #360) and requests that the Court set a deadline for the Debtor to file an Amended Plan and Amended Disclosure Statement.

WHEREFORE, MLS prays that the Court enter an Order granting the Motion To Set Deadline For Debtor To File Amended Plan and Disclosure Statement, for cause, as set forth herein, and setting a date certain by which the Debtor is directed to file any Amended Plan or Disclosure Statement that the Debtor intends on presenting to the creditors for approval and confirmation and for any and all other relief deemed just and equitable in the premises.

Dated this 24<sup>th</sup> day of January, 2024

Respectfully submitted,

*/s/ Terry L. Gibson*

---

Terry L. Gibson AT0002903  
WANDRO & ASSOCIATES, P.C.  
2015 Grand Avenue, Suite 102  
Des Moines, Iowa 50312  
Telephone: 515/717-7455  
Facsimile: 515/608-4645  
tgibson@wandrolaw.com

**COUNSEL TO MANCHESTER  
LEASING SERVICES, INC.**

**Certificate of Service**

The document was served electronically on parties who receive electronic notice through the CM/ECF as listed on CM/ECF's notice of electronic filing.

Dated this 24<sup>th</sup> day of January, 2024.

*/s/ Terry L. Gibson*

---

Terry L. Gibson